

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, Individually and On	:	Civil Action No. 1:07-cv-07895-DAB
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	
CHINA SUNERGY CO. LTD., et al.,	:	
	:	
Defendants.	:	
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ADEL SHESHTAWY, Individually and On	:	Civil Action No. 1:07-cv-08656-DAB
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	
CHINA SUNERGY CO. LTD., et al.,	:	
	:	
Defendants.	:	
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ANTHONY GIOMBETTI, et al., Individually	:	Civil Action No. 1:07-cv-09689-UA
and On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiffs,	:	
vs.	:	
CHINA SUNERGY CO. LTD.,	:	
	:	
Defendant.	:	
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DECLARATION OF MARIO ALBA JR. IN SUPPORT OF THE MOTION OF THE HUGHES  
GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND FOR  
APPROVAL OF SELECTION OF LEAD COUNSEL

Mario Alba Jr., declares under penalty of perjury:

1. I am an associate with Coughlin Stoia Geller Rudman & Robbins LLP (“Coughlin Stoia”), one of plaintiff’s counsel in the action entitled *Anthony Giombetti, et al. v. China Sunergy Co., Ltd.*, Civil Action No. 1:07-cv-09689. I submit this Declaration in support of the Motion of Howard Hughes, Don Vandenheuval, Jie Wu and Andrew P. Van Gorder (the “Hughes Group”) for consolidation, appointment as Lead Plaintiff and for approval of selection of Lead Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the first notice published regarding the pendency of these actions, published by plaintiff in the action entitled *Thomas Brown v. China Sunergy Co. Ltd., et al.*, Civil Action No. 1:07-cv-07895-DAB, on *Market Wire*, a national, business-oriented newswire service, on September 10, 2007.

3. Attached hereto as Exhibit B is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated collective losses of the Hughes Group at approximately \$64,460.97, in connection with its transactions in China Sunergy Co. Ltd. American Depository Receipts during the Class Period.

4. Attached hereto as Exhibit C are the certifications of the members of the Hughes Group.

5. Attached hereto as Exhibit D is a true copy of the firm resume of Coughlin Stoia.

6. Attached hereto as Exhibit E is a true copy of the firm resume of Schiffrin Barroway Topaz & Kessler, LLP.

DATED: November 9, 2007

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/s/ Mario Alba Jr.  
MARIO ALBA JR.

**CERTIFICATE OF SERVICE**

I, Mario Alba Jr., hereby certify that on November 9, 2007, I caused a true and correct copy of the attached:

Notice of Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of The Hughes Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of Mario Alba Jr. in Support of the Motion of The Hughes Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

CHINA SUNERGY

Service List - 11/9/2007 (07-0229)

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**Counsel For Defendant(s)**

Legal Department  
China Sunergy Co., Ltd.  
c/o CT Corporation System  
111 8th Avenue  
New York, NY 10011

Legal Department  
Cowen & Co., LLC  
1221 Avenue of the Americas  
New York, NY 10020

Legal Department  
Jefferies & Co., Inc.  
520 Madison Avenue, 12th Floor  
New York, NY 10022

**Counsel For Plaintiff(s)**

Evan J. Smith  
Brodsky & Smith, LLC  
240 Mineola Blvd., 1st Floor  
Mineola, NY 11501  
516/741-4977  
516/741-0626(Fax)

Samuel H. Rudman  
David A. Rosenfeld  
Coughlin Stoia Geller Rudman & Robbins LLP  
58 South Service Road, Suite 200  
Melville, NY 11747  
631/367-7100  
631/367-1173(Fax)

Kim E. Miller  
Kahn Gauthier Swick, LLC  
12 East 41st Street, 12th Floor  
New York, NY 10017  
212/696-3730  
504/455-1498(Fax)

Lewis S. Kahn  
Kahn Gauthier Swick, LLC  
650 Poydras Street, Suite 2150  
New Orleans, LA 70130  
504/455-1400  
504/455-1498(Fax)

CHINA SUNERGY

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Eric J. O'Bell  
Law Offices of Eric J. O'Bell  
3500 North Hullen Street  
Metairie, LA 70002  
504/456-8677  
504/456-8624(Fax)

Stuart L. Berman  
Sean M. Handler  
Schiffrin Barroway Topaz & Kessler, LLP  
280 King of Prussia Road  
Radnor, PA 19087  
610/667-7706  
610/667-7056(Fax)